



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

**JUN 22 2016**

**CERTIFIED MAIL 7009 1680 0000 7677 8923**  
**RETURN RECEIPT REQUESTED**

Mr. James Siemer  
Vice President of Manufacturing  
Peerless of America  
1201 West Wabash Avenue  
Effingham, Illinois 62401

Re: Notice of Violation  
Compliance Evaluation Inspection  
ILD050223593

Dear Mr. Siemer:

On April 13, 2016, a representative of the U.S. Environmental Protection Agency inspected the Peerless of America facility located in Effingham, Illinois (POA). As a small quantity generator of hazardous waste, POA is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 et seq. (RCRA). The purpose of the inspection was to evaluate POA's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by POA, EPA's review of records pertaining to POA, and the inspector's observations, EPA has determined that POA has unlawfully stored hazardous waste without a permit or interim status as a result of POA's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code (IAC) tit. 35 § 722.134(d)-(f) [40 C.F.R. § 262.34(d)-(f)]. EPA has identified the permit exemption conditions with which POA was out of compliance at the time of the inspection in paragraphs 1- 5, below.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. AC tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 4 and 5 are also independent TSD requirements incorporated from Ill.

Admin. Code tit. 35 Part 725. Accordingly, each failure of POA to comply with these conditions is also a violation of the corresponding requirement in IAC tit. 35 Part 725 [40 C.F.R. Part 265].

Finally, EPA has determined that POA violated RCRA requirements related to manifests identified in paragraph 6 below.

**STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS**

At the time of the inspection, POA was out of compliance with the following small quantity generation permit exemption conditions:

1. Date When Each Period of Accumulation Begins

Under IAC tit. 35 §§ 722.134(d)(4) and (a)(2) [40 C.F.R. §§ 262.34(d)(4) and (a)(2)], a small quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the inspection, POA stored eight 55-gallon drums of D002/spent caustic hazardous waste that were not marked with the date upon which each period of accumulation of hazardous waste began.

At the time of the inspection, POA attached labels with the date of accumulation upon the eight 55-gallon drums of D002/spent caustic hazardous waste. This violation has been corrected.

2. Containers of Hazardous Waste must be marked with the words "Hazardous Waste"

Under Ill. Admin. Code tit. 35 §§ 722.134(d)(4) and (a)(3) [40 C.F.R. §§ 262.34(d)(4) and (a)(3)], a small quantity generator must clearly mark each container holding hazardous waste with the words "Hazardous Waste."

At the time of the inspection, POA stored eight 55-gallon drums of D002/spent caustic hazardous waste that were not marked with the words "Hazardous Waste."

At the time of the inspection, POA attached labels with the words "Hazardous Waste" upon the eight 55-gallon drums of D002/spent caustic hazardous waste. This violation has been corrected.

3. Satellite Accumulation Hazardous Waste Container Labeling

Under Ill. Admin. Code tit. 35 § 722.134(c)(1)(ii) [40 C.F.R. § 262.34(c)(1)(ii)], a small quantity generator must label or clearly mark each satellite accumulation container

holding hazardous waste with the words "Hazardous Waste" or other words that identify the contents of the container.

At the time of the inspection, one satellite accumulation 55-gallon drum of D002/spent caustic hazardous waste in the satellite accumulation area was not labeled with the words "Hazardous Waste" or other content-identifying words.

At the time of the inspection, POA clearly marked the one satellite accumulation 55-gallon drum of D002/spent caustic hazardous waste with the words "used caustic". This violation has been corrected.

#### 4. Satellite Accumulation Hazardous Waste Container Management

Under Ill. Admin. Code tit. 35 § 722.134(c)(1)(i) [40 C.F.R. § 262.34(c)(1)(i)], a small quantity generator accumulating hazardous waste in satellite accumulation, must keep containers closed except when adding or removing waste in compliance with 35 § 725.273(a) [40 CFR 265.173(a)].

At the time of the inspection, one satellite accumulation 55-gallon drum of D002/spent caustic hazardous waste in the satellite accumulation area was not closed.

At the time of the inspection, POA closed the one satellite accumulation 55-gallon drum of D002/spent caustic hazardous waste. This violation has been corrected.

#### 5. Use and Management of Containers

Under Ill. Admin. Code tit. 35 §§ 722.134(d)(4) and 725.135 [40 C.F.R. §§ 262.34(d)(4) and 265.35], a small quantity generator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency, unless aisle space is not needed for any of these purposes.

At the time of the inspection, POA stored eight 55-gallon drums of D002/spent caustic hazardous waste in an area without adequate aisle space.

**Summary:** By failing to comply with the conditions for a permit exemption, above, POA became an operator of a hazardous waste storage facility, and was required to obtain an Illinois hazardous waste storage permit. POA failed to apply for such a permit. POA's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 is also an independent violation of the corresponding TSD requirement.

## OTHER VIOLATION

### 6. Hazardous Waste Manifests

Under Ill. Admin. Code tit. 35 § 722.123(a) [40 C.F.R. § 262.23(a)], a generator must sign the manifest certification by hand.

On the manifest numbered 010668852JJK, POA did not sign the manifest certification. A notation on the manifest referred to an attachment but the attachment was not found in the file.

At this time, EPA is not requiring POA to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the condition for a permit exemption outlined in paragraph 5 and the manifest violation in paragraph 6, above.

During the inspection, as observed by EPA, you took certain actions to establish compliance with the above conditions listed in paragraphs 1-4. According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken related to the violations outlined in paragraphs 5 and 6. You should submit your response to Robert Dean Smith, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Robert Dean Smith, of my staff, at (312) 886-7568 or at [smith.robert@epa.gov](mailto:smith.robert@epa.gov).

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: Todd Marvel, Illinois EPA, ([todd.marvel@illinois.gov](mailto:todd.marvel@illinois.gov))



U. S. Environmental Protection Agency  
Region 5, Land and Chemicals Division  
RCRA Branch  
77 West Jackson Boulevard  
Chicago, Illinois 60604

## RCRA COMPLIANCE EVALUATION INSPECTION REPORT

**SITE NAME:** Peerless of America, Inc.  
**EPA ID NUMBER:** ILD050223593  
**ADDRESS:** 1201 West Wabash Avenue  
Effingham, Illinois 62401  
**DATE OF INSPECTION:** April 13, 2016  
**EPA INSPECTOR:** Robert Dean Smith, LPG  
Environmental Scientist

**PREPARED BY:**

Robert Dean Smith  
Robert Dean Smith, LPG  
Compliance Section 1

06/13/2016  
Date

**APPROVED BY:**

Michael Cunningham  
Michael Cunningham, Chief  
Compliance Section 1

06/17/16  
Date

### **Purpose of Inspection**

This inspection was an evaluation of Peerless of America's (POA) compliance with hazardous waste, used oil, and universal waste regulations found at 35 Illinois Administrative Code and the Code of Federal Regulations (CFR). The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The site notified as a Small Quantity Generator (SQG).

### **Participants**

#### *Inspector:*

Robert Dean Smith, LPG, Environmental Scientist, EPA

#### *Site Representative:*

James Siemer, Vice President of Manufacturing

### **Introduction**

On April 13, 2016, I arrived at the site at approximately 8:30 AM. The receptionist informed me that the facility contact, Mr. James Siemer, was busy with two insurance inspectors. I sat in the lobby working on paperwork as the facility President, Todd Probst, walked by and asked me if I have been helped. I introduced myself, presented my business card, and Mr. Probst introduced himself. In response to my mission to conduct a hazardous waste inspection, Mr. Probst stated that POA did not generate hazardous waste. Mr. Probst explained the business to me and explained some of the exhibits in the lobby. I awaited Mr. Siemer. After a brief wait, Mr. Siemer arrived in the lobby area to begin the inspection.

### **Site Description**

POA built the structure that it occupies in 1969 and moved in that same year. The facility has 186,000 square feet under roof. Presently, POA has approximately 114 employees that includes office workers and laborers, down from 175 employees a few years ago. The facility operates 4 days per week, two shifts per day. Six employees work the second shift. Additional shifts may be added if the work load demands it.

The facility is non-union and the company is privately owned. The company was founded in 1912 and built the facility it presently occupies in 1969. The company was purchased in 2014.

The company produces "heat transfer products". In other words, radiators of various shapes and sizes. There are two production areas; the extrusion manufacturing area and coil manufacturing area. The main industries served are the mining industry and trucking industry. POA depends on the trucking industry for most of its production. Peerless' website states that the following industries are served: Aerospace, automotive, industrial equipment/processing, on-road truck/off-road truck, military, power/energy, aftermarket, commercial refrigeration, residential refrigeration, air conditioning, medical refrigeration, and refrigeration display cases.

As I began my inspection, Mr. Siemer stated that Peerless "does not generate hazardous waste". As I discussed waste generation with Mr. Siemer, I asked for any sort of waste manifests or shipping papers that are associated with the disposal of industrial waste. Mr. Siemer provided

hazardous waste manifests, hazardous waste labels that are placed onto the waste drums (55-gallon steel drums), and a hazardous waste determination for its waste. Mr. Siemer stated that POA used to place "drum warmers" onto its liquid waste and remove all liquids resulting in a solid that was disposed of as a non-hazardous waste. The new owners stated that they did not like that process and that POA would dispose of its waste in the liquid form. Mr. Siemer stated that he believed that the waste was the same waste but in a different form.

I informed Mr. Siemer that solids cannot be measured for pH and liquids can be measured for pH. I stated that it appears that his waste hauler/disposal facility, EQ Detroit, has correctly characterized and managed the hazardous waste. I stated that POA's waste has been identified as a hazardous waste with the characteristic for corrosivity, D002.

### **Site Tour**

Mr. Siemer and I entered the facility and observed facility operations including: satellite accumulation areas, the less-than 90-day accumulation containers and tanks and emergency equipment. I took photographs of the various facility operations, waste operations, and waste storage/accumulation areas during the site tour.

We first visited the dip tank which dies are placed to dissolve the aluminum sprue that adheres to the dies. I was informed that the caustic solution dissolves the aluminum but leaves the steel dies unharmed. I was informed that the dip tank is used until the caustic solution has become ineffective and then the solution is emptied into 55-gallon drums. New solution is then placed into the dip tank.

I observed a satellite accumulation drum that had just been filled. I observed that the drum had not been marked with words that identify the contents of the container. Mr. Siemer obtained a paint stick and marked the drum.

We then walked to the area where POA accumulates its waste. I observed that the drums were not labeled. Mr. Siemer stated that POA puts the hazardous waste labels onto the drums when they are to be shipped. I informed Mr. Siemer that the drums need to be labeled immediately upon arriving at the accumulation area. Mr. Siemer obtained the hazardous waste labels from his office area and labeled the drums. The labels are supplied by the waste transporter and are preprinted.

I also observed that adequate aisle space was not being kept at the time of the inspection.

I also observed spill control equipment within the dip tank area.



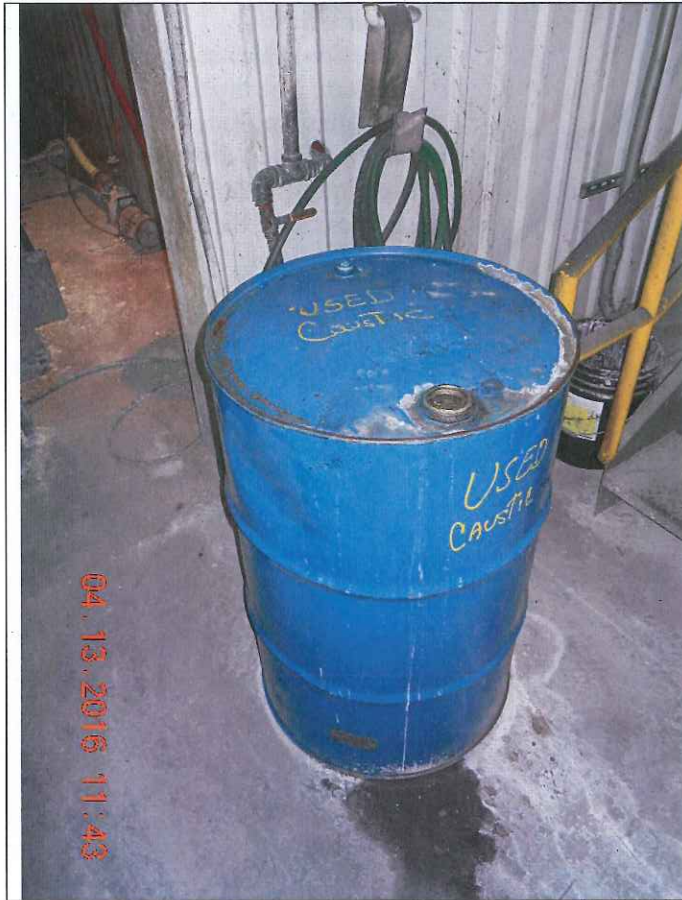


**Picture #: 1**  
**Location:** Less than 180  
hazardous waste  
accumulation area  
**Subject:** Hazardous  
waste with hazardous  
waste labels.



**Picture #: 2**  
**Location:** Less than 180  
day hazardous waste  
accumulation area  
**Subject:** Drums without  
hazardous waste labels





**Picture #: 3**

**Location:** Satellite accumulation area

**Subject:** Satellite accumulation drum has recently been filled. The drum is adjacent to the caustic dip tank and has been filled.



**Picture #: 4**

**Location:** Caustic dip tank

**Subject:** The dip tank in which steel dies are placed into a caustic solution which dissolves the aluminum sprue but leaves the stainless steel die unharmed.



**Picture #:** 5

**Location:** Satellite accumulation area.

**Subject:** 55-gallon drum that has just been filled and prior to being labeled or marked.

### Records Review

I reviewed waste profiles/characterizations, land disposal restriction notifications (LDR). I completed a SQG checklist during the records review, *see* Attachment A.

In our initial conversation, Mr. Siemer stated that he believed that POA did not generate hazardous waste and he provided his logic for his belief. He stated that the solid form of their waste was not hazardous and thus, the liquid form was also not a hazardous waste. The waste was only in a “different” form. Even though he had this belief, he stated that he knew the properties of the waste and that it was caustic waste. He stated that POA could not neutralize the waste and sewer the waste because of the aluminum in the caustic solution. Furthermore, he showed me the hazardous waste labels that he places onto the drums prior to shipment. The labels are standard yellow background labels with black printing stating that the waste is “Hazardous Waste”. The labels are pre-printed with the appropriate information such as EPA identification number, hazardous waste name, hazardous waste code, and address.

### Hazardous Waste Manifests/LDR

I was provided with hazardous waste manifests back to 2014. I reviewed 7 manifests. I calculated that the hazardous waste generation, if it were consistent month to month within the time period that the manifest covered, was about 350 kg to 400 kg per month. I also calculated

that the shipments were not quite 6 months apart. I observed that POA did not exceed the time allowed for accumulation for a small quantity generator of hazardous waste.

I noted that one manifest, number 010668852 JJK, a shipment of 660 gallons of D002, sent to EQ, did not have the generator signature but instead had a notation to "see attachment". The attachment was not in the file.

#### Hazardous Waste Determination

Within the folder holding the hazardous waste manifests, I found a hazardous waste determination in the form of a waste profile sheet generated by Giant Resource Recovery, Attalla, Inc. The profile sheet identified the waste as a corrosive waste with a pH greater than 12.1. TCLP metals were included in the analysis and no metals were found. The profile sheet stated that the proper shipping name is "Waste Corrosive Liquid" and the hazardous waste code is "D002".

#### Hazardous Waste Training

The employees are knowledgeable regarding the corrosive nature of the waste. The employees know to label the drums of waste prior to transport off-site. The employees also are knowledgeable regarding cleanup of spilled waste.

#### Preparedness and Prevention

The facility has a close relationship with the Effingham Fire Marshall. The facility has detailed evacuation procedures and evacuation maps. The employees are notified of emergencies via a PA and alarm system. Employees have radios for communication. Mr. Siemer is the primary emergency coordinator and is available outside the workplace. The telephone number to summon emergency authorities is 911.

#### Closing Conference

I stated that POA does generate a hazardous waste, and falls into the small quantity generator classification. I stated that POA labels its drums with preprinted hazardous waste stickers, ships its waste on hazardous waste manifests, identifying the waste as D002 hazardous waste, shipping the waste to a RCRA permitted Treatment, Storage, and Disposal Facility. I stated that my inspection revealed that POA did not label its hazardous waste drums until POA was ready to ship the waste off-site for disposal. I stated that the satellite accumulation drum must be labeled with words that describe the waste but not necessarily the same label that is used to ship the waste. I stated that drums of hazardous waste must be labeled and marked once waste was placed into the drum. I stated that drums of waste must be dated once full at the satellite accumulation area or upon waste being placed into the drum if the drum is accumulating waste at the less than 90 day hazardous waste accumulation area. I was informed that waste is placed into drums only at the satellite accumulation area.

I stated that we arrived at the corrosive dip tank at the time a satellite accumulation drum was filled. I observed that the bung had not been put into the drum yet and that the drum was not marked.



I stated that the drums of hazardous waste were labeled at the time of the inspection. I stated that the satellite drum we observed was marked and a bung was placed into the drum. I stated that POA must work out a less than 90 day accumulation area that will allow aisle space.

We discussed the issue of adequate aisle space. Mr. Siemer stated that space is an issue but he will fix the problem.

The copy of 40 CFR I had with me had several loose pages including the pages that contained the SQG regulations. Mr. Siemer copied the SQG regulations as well as the sections in 40 CFR 265 that applies to a SQG.

### **Attachments**

#### **A. Checklist**

# **ATTACHMENT A**

## **SQG Checklist**



Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>PART 722: STANDARDS APPLICABLE TO SMALL-QUANTITY GENERATORS OF HAZARDOUS WASTE (100 - 1000 KG/MO.)</b>	
	<b>SUBPART A: GENERAL</b>	
	<b>Section 722.111 Hazardous Waste Determination</b>	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.111
808.121(a)	Has the generator correctly determined if the solid waste it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	<b>Section 722.112 USEPA Identification Numbers</b>	808.121(a)
722.112(a)	Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	<b>SUBPART B: THE MANIFEST</b>	
	<b>Section 722.120 General Requirements</b>	
722.120(a)	Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
	If "No", proceed to Section 722.120(e).	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(d)
722.120(e)	Does the generator reclaim waste through a contractual agreement with a recycling facility in which: - the type of waste and frequency of shipments are specified in the agreement? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - the vehicle used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - the generator has maintained a copy of the agreement for 3 years after termination or expiration of the agreement? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.120(e)
728.107(a)(10)	Has a small-quantity generator with a tolling (contractual) agreement pursuant to Section 722.120(e) retained on site a copy of the notification and certification of the initial waste shipment together with the tolling agreement for at least 3 years after the termination or expiration of the agreement? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	728.107(a)(10)
	<b>Section 722.121 Acquisition of Manifests</b>	
722.121(a)	Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.121(b)
722.122	<b>Section 722.122 Number of Copies</b> Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(a)	<b>Section 722.123 Use of the Manifest</b> For each manifest reviewed, has the generator: - signed the certificate by hand? Yes _____ No <input checked="" type="checkbox"/> N/A _____ - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No _____ N/A _____ <i>unk.</i>	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.123(b)
722.123(c)	- has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.123(c)
	<b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b> Is there any hazardous waste ready for transport off-site? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If so, is the generator complying with the pre-transport requirements in Subpart C? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(722.134(c))	<b>Section 722.134 Accumulation Time</b> Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words to identify the contents? Yes _____ No <input checked="" type="checkbox"/> N/A _____ Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If there are more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A <input checked="" type="checkbox"/> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	inspection
(722.134(d))	Has the generator complied with the following requirements: Yes _____ No _____ N/A _____ <b>Note:</b> If the quantity of hazardous waste on-site ever exceeds 6000 kg, the facility is also a storage facility subject to full regulation under Parts 724 and 725 and the permit requirements under Part 703. Does the facility accumulate hazardous waste in containers? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A _____ If "No", go to Subpart J.	
	<b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b> Is the accumulation start date marked on each container? Yes _____ No <input checked="" type="checkbox"/> N/A _____ Is each container marked with the words "Hazardous Waste"? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	inspection
(722.134(a)(2))		
(722.134(a)(3))		
(725.271)		

Note: one manifest was not signed by hand, 010668852 JJK, 7/21/15  
 All

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.272)	Is the waste compatible with the container and/or liner? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	In spectrum
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	Satellite drum not closed. Operator just filled the drum and walked away.
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/> Does the generator accumulate and/or treat hazardous waste in tanks? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
	<b>Note:</b> If "No", go to Subpart C. <b>COMMENTS:</b> The satellite drum was just filled	
	<b>SUBPART J: TANK SYSTEMS</b> <b>Section 725.301 Generators of 100 to 1000 kg/mo.</b>	
(722.134(a)(2))	Is each tank marked with the words "Hazardous Waste"? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	
(725.301(b)(1))	Is the generator in compliance with the treatment or storage of hazardous waste in tanks as referenced in Section 725.117(b)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.301(b)(2))	Have hazardous wastes or treatment reagents been placed in a tank causing the tank or its inner liner to rupture, leak, corrode or otherwise fail before the end of its intended life? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.301(b)(3))	Unless a tank is equipped with drainage control or a diversion structure, do any uncovered tanks have at least 2 feet of freeboard? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.301(b)(4))	If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow (i.e. waste feed cutoff system or by-pass system to a stand-by tank)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.301(c))	<p>Is the generator inspecting, where present, the following:</p> <p>1) discharge control equipment at least once each operating day?  Yes _____ No _____ N/A _____</p> <p>2) data from monitoring equipment at least once each operating day?  Yes _____ No _____ N/A _____</p> <p>3) the level of the waste in the tank at least once each operating day?  Yes _____ No _____ N/A _____</p> <p>4) physical evidence of corrosion at least weekly?  Yes _____ No _____ N/A _____</p> <p>5) discharge confinement structures to detect erosion or leaking at least weekly?  Yes _____ No _____ N/A _____</p>	
(725.301(d))	<p>Has the generator removed all hazardous waste from tanks and associated equipment and structures upon closure of the facility?  Yes _____ No _____ N/A _____</p>	
(725.301(e))	<p>If ignitable or reactive wastes are stored in tanks, is the generator in compliance with Section 725.301(e)?  Yes _____ No _____ N/A _____</p>	
(725.301(f))	<p>Is the generator in compliance with the regulations concerning incompatible wastes in Section 725.301(f)?  Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p> <p><b>SUBPART C: PREPAREDNESS AND PREVENTION</b></p>	
(725.131)	<p>Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?  Yes _____ No _____ N/A _____</p>	inspection
(725.132)	<p>Is the facility equipped with the following if necessary:</p> <p>a) an internal communication or alarm system(s)?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>b) a telephone or other device to summon emergency assistance from local authorities?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment?  Yes _____ No _____ N/A _____</p> <p><input checked="" type="checkbox"/> d) water at adequate volume and pressure for fire control?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	phone / Alarm
(725.133)	<p>Is the facility testing and maintaining communication/alarm systems, fire protection equipment, spill control equipment and decontamination equipment?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.134)	<p>a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance?  Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	radios
(725.135)	<p>Is the facility maintaining adequate aisle space?  Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.137)	<p>Has the facility attempted to make the following arrangements, <u>as appropriate</u>, for the type of facility and waste:</p> <ul style="list-style-type: none"> <li>- arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></li> </ul>	<p><i>City FD walk through Annually</i></p>
(728.107(a)(5))	<p><b>Section 728.107 Waste Analysis and Recordkeeping</b></p> <p>Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the plan on-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the plan include a detailed physical and chemical analysis? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>	
(722.134(d)(5))	<p>A) Is there at least one employee on site or on call with the responsibility to coordinate all emergency response measures? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>B) Is the following information posted next to the telephone:</p> <ul style="list-style-type: none"> <li>- the name and telephone number of the emergency coordinator? <i>EC on site</i> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- the location of fire extinguishers and spill control equipment and, if present, fire alarms? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> <li>- the number of the fire department unless the facility has a direct alarm? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul> <p>C) Have employees received the proper waste handling and emergency procedures training relevant to their positions? <i>labeling into loading</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>D) If there have been any emergencies that required a response, did the emergency coordinator comply with the requirements of Section 722.134(d)(5)(D)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p><b>Note:</b> A small-quantity generator who must transport the waste over a distance of 200 miles or more for treatment, storage or disposal may accumulate waste on-site for up to 270 days without a permit provided that the generator complies with the requirements of subsection (d).</p> <p><b>SUBPART D: RECORDKEEPING AND REPORTING</b></p> <p><b>Section 722.140 Recordkeeping</b></p>	
722.140(a)	<p>Has the generator retained for a period of 3 years:</p> <ul style="list-style-type: none"> <li>- a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	722.140(a)
722.140(c)	<p>Has the generator retained for a period of 3 years:</p> <ul style="list-style-type: none"> <li>- copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></li> </ul>	722.140(c)

Regulation	RCRA SMALL-QUANTITY GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No <input checked="" type="checkbox"/> N/A _____	
722.142(b)	<b>Section 722.142 Exception Reporting</b> Has the generator filed an exception report if a signed copy of the manifest has not been received within 60 days of the date of delivery to the transporter? Yes _____ No <input checked="" type="checkbox"/> N/A _____	722.140(d)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.142(b)
722.150	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b> Is the generator an exporter of hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If "Yes", has the generator complied with the requirements of Subpart E? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.143
722.160	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b> Is the generator an importer of hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If "Yes", has the generator complied with the requirements of Subpart F? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.150
722.170	<b>SUBPART G: FARMERS</b> Is the generator a farmer? Yes _____ No <input checked="" type="checkbox"/> N/A _____ If "Yes", has the generator complied with the requirements of Subpart G? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.160
	COMMENTS:	722.170

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